



**Rocky Flats Citizens Advisory Board
Recommendation 2003-9**

**Comments and Recommendations on Building 771/774
Groundwater Collection System Draft Proposed Action
Memorandum**

Approved December 4, 2003

Letter to:

Mr. Frazer Lockhart
U.S. Dept. of Energy
Rocky Flats Field Office
10808 Hwy. 93, Unit A
Golden, CO 80403

Mr. Mark Aguilar
U.S. EPA
999 18th St. Ste. 500
Denver, CO 80202

Mr. Steve Gunderson
CDPHE
4300 Cherry Creek Dr. South
Denver, CO 80246

Dear Mr. Lockhart, Mr. Aguilar, and Mr. Gunderson:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review the "Draft Proposed Action Memorandum (PAM) for the 771/774 Groundwater Collection System," dated October 29, 2003. We offer the following comments and recommendations on the document:

Issues Related to the Carbon Tetrachloride Plume:

The PAM appears to be premature. It does not include an adequate description of the location or configuration of the free liquid pool or pools of carbon tetrachloride (CCl₄) or the contaminant plume migrating in the groundwater from the CCl₄. We would appreciate it if the site would provide such a description.

Removal of the CCl₄ source is planned for 2005. Until this is completed, design requirements for the system to collect and possibly treat residual contamination will be

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hard to define.

The proposed collection system is intended to contain contaminants migrating to the north or west, but contaminants migrating eastward or possibly under the collection system are not addressed.

The PAM should be revised to include:

1. A complete description of the CCl₄ contamination sources and plumes migrating in the groundwater and any additional sampling and analysis that may be required to fully define these.
2. A description of the procedures to be employed for removal of CCl₄ free product.
3. A discussion of how the collection system will insure capture of all the migrating contaminants.
4. A description of the treatment to be provided for contaminated groundwater that may be released from the collection system.

Other Issues:

1. The PAM should address continuous monitoring and management of discharge from the drainage system. The Board notes that the Proposed Action Memorandum currently states on page 2 under the Project Description that, "The water discharged by the passive subsurface groundwater collection system will be monitored in accordance with the Integrated Monitoring Plan as a foundation drain unless a groundwater collection system is installed." The description of exactly how the discharge will be monitored as outlined in the Integrated Monitoring Plan should be added to this document, rather than relying solely on a reference.
2. Because of concerns that the tunnel may serve as a conduit for groundwater transport, the Board would prefer it not be left in place. A related concern would be subsidence and potential erosion should the tunnel collapse. We also have similar concerns with other remaining tunnels on site.

The Board would like to thank the site for the opportunity to comment on the pre-decisional draft of this document to involve us early in the decision-making process. We have reviewed the public comment draft issued on December 1 as well, and find that our comments based on the pre-decisional draft are still relevant. We thank you for your consideration of our comments and look forward to your earliest response.

Sincerely,

Victor Holm
Chair

cc: Dyan Foss, Kaiser-Hill

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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